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November 15, 2005

VIA ELECTRONIC SUBMISSION

Ms. Marlene H. Dortch
Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: In the Matter of WC Docket 03-250, SBC Communications, Inc. Petition for Waiver of Section 61.42 of the Commission's Rules

Dear Ms. Dortch:

On October 21, 2005, SBC representatives met with Pricing Policy Division staff members regarding SBC's Petition for Waiver of Section 61.42 of the Commission's rules.[1] During the meeting, Staff requested that SBC provide answers to several questions specific to the services referenced in its Petition. The attached document provides answers to those questions for the relevant service.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically. I ask that this letter be placed in the record for the above referenced proceeding.

Please contact me with any questions at 202-326-8831.

Sincerely,

/s/ Sarah L. Green

Attachment

CC: Deena Shetler
Judy Nitsche
Marvin Sacks

[1] Letter from Sarah L. Green, Associate Director, SBC, to Marlene H. Dortch, Secretary, FCC, filed Oct. 24, 2005.

SBC Responses to FCC's Data Request for OPT-E-MAN®

OPT-E-MAN® Service is a packet-switched, advanced service that offers special access customers the ability to connect to SBC's high speed packet-switched network using Ethernet. Specifically, OPT-E-MAN transports the customer's data at speeds of 5 Mbs - 1 Gbs between the customer's identified local area networks (LANs) within the same metropolitan area, thereby allowing multiple locations to communicate with each other.

QUESTIONS: 1, 6

1.) Show all parts of the network (e.g., show channel terminations (or equivalent) to the end-user and POP, inter-office transport facilities, central office, port, Ethernet switches, etc.)

6.) Please diagram all parts of the SBC network used to provide these services (e.g., show channel terminations (or equivalent) to the end-user and POP, interoffice transport facilities, central office.)

ANSWERS:

OPT-E-MAN is a packet-switched, advanced service that connects the end-user to other end users or to a carrier's point of presence (POP) location. The service components of OPT-E-MAN are provided and operated by the SBC LECs, and include the following: ports,[1] which include transport, Committed Information Rates (CIR),[2] and Ethernet Virtual Channels (EVCs).[3] Network terminating equipment (NTE), loop and interoffice fiber facilities, and Ethernet switches are the physical elements that provide the service.

Diagram 1 details the physical network architecture of the OPT-E-MAN service from an end-user to an IXC POP or from an end-user to an end-user. As the diagram shows, NTE is located on the SBC side of the demarcation point (DMARC) that connects to loop fiber which then connects to an Ethernet switch directly at the serving wire center or in a distant wire center via interoffice facility fiber (IOF). The Ethernet switch connects to other Ethernet switches within a LATA to create network connectivity between customer locations. EVCs connect the end-user to other end-users or a carrier POP location.

[1] Ports, similar to channel terminations, connect the end-user interface to SBC's network.

[2] CIR, similar to the speed of the service, determines the amount of information that can be transmitted.

[3] EVCs are software translations in the Ethernet switch that create the logical connections between ports on the network.

<u>DIAGRAM 1:</u> OPT-E-MAN Physical Network Architecture for End-User to IXC POP or End-User to End-User Configurations

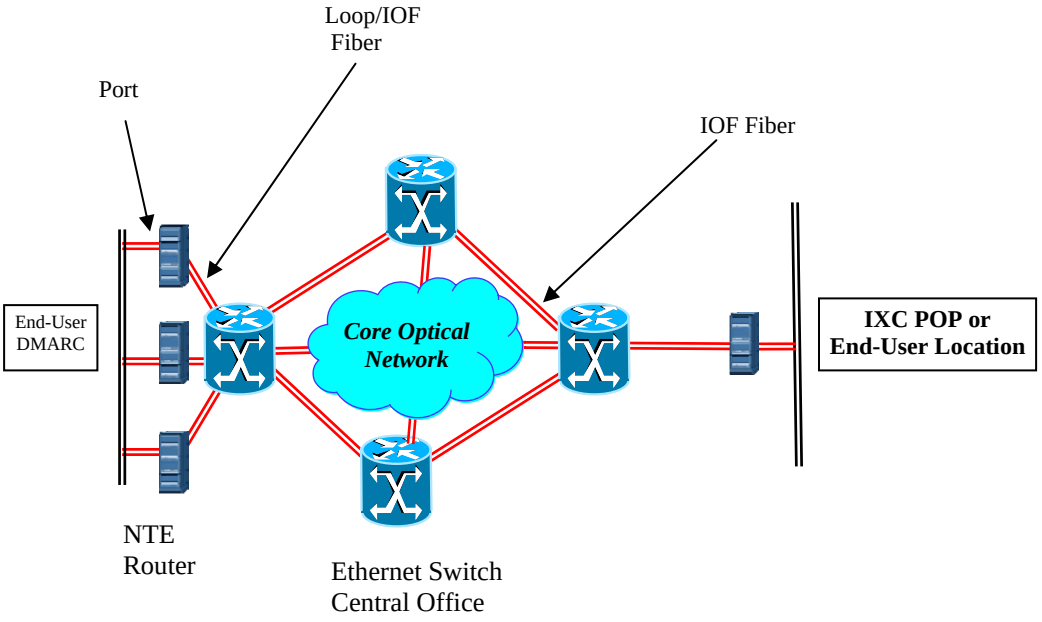
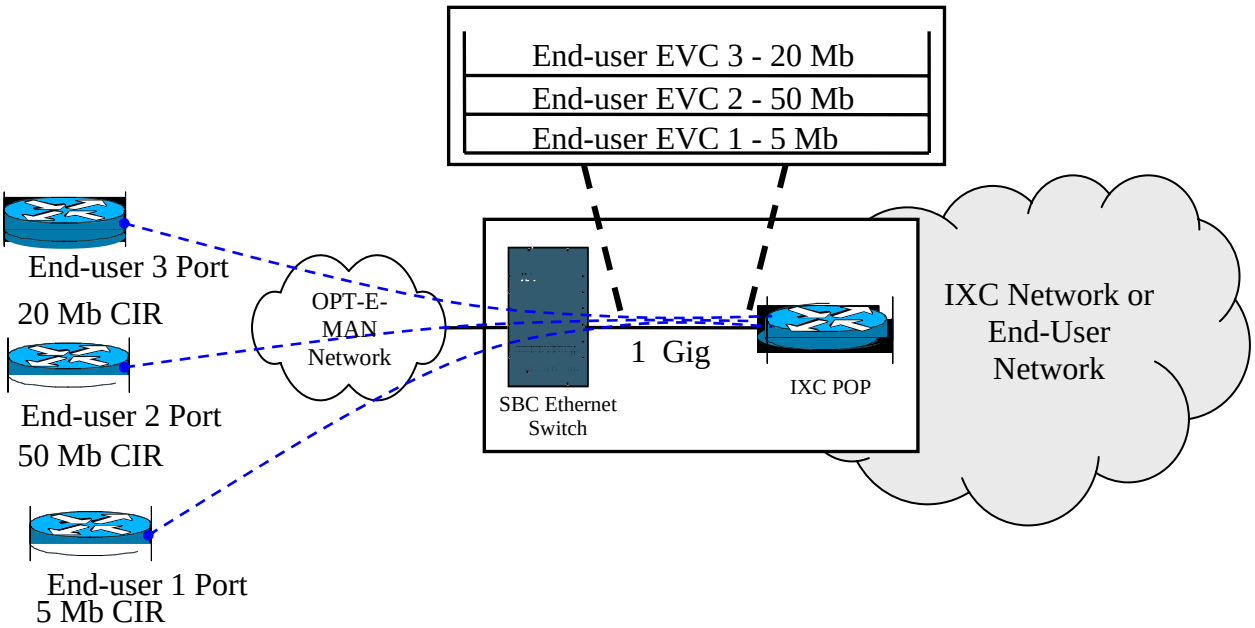


Diagram 2 illustrates OPT-E-MAN's logical or virtual connections between customer locations and an IXC's network and or multiple customer remote sites connected to a customer network location. Specifically, it depicts three EVC logical connections between the IXC's network and the customer ports to complete an enterprise customer Wide Area Network (WAN).

<u>DIAGRAM 2</u>: OPT-E- MAN Logical or Virtual Network Architecture for End-User to IXC POP or End-User to End-User Configurations



QUESTIONS: 2, 3, 7, 8

2.) What are the rate elements of each service? Identify the assets, activities (e.g., labor), and functions SBC provides with respect to each rate element.

3.) For each service, what is the rate for each applicable rate element and where (tariff number and page) is each such rate found?

7.) What are the rate elements of each service? Identify the assets, activities (e.g., labor), and functions SBC provides with respect to each rate element.

8.) For each service, what is the rate for each applicable rate element and where (tariff number and page) is each such rate found?

ANSWERS:

OPT-E-MAN rates, rate elements, asset activity, and functions associated with each element are described below, as are the applicable tariff references.

A. Basic or Basic Plus Ports

- Port connections provide connectivity from the end-user to the network.
- Basic ports support point-to-point or point-to-multipoint configurations.
- Basic Plus supports point-to-point, point-to-multi-point, or multi-point configurations.

Port Connection - 10/100Mbps or 1Gbps

- Asset activity - The router placement, cross connect, provisioning of loop fiber and potentially IOF fiber to connect to the Ethernet switch are the assets associated with the ports.
- Function – Provides connectivity between the customer premise equipment and the OPT-E-MAN network for speeds up to the speed of the port purchased.

Ports	**M-to-M**	**1-Year**	**2-Year**	**3-Year**	**5-Year**	**NRC**
Basic or Basic Plus						
10/100 Mbps	$ 925	$ 780	$ 750	$ 650	$575	$1,925
Gigabit Ethernet	$1,400	$1,200	$1,150	$1,000	$850	$2,100

Port Connection rates can be found in the following tariff sections:

- Midwest FCC Tariff 2 Section 24, page 24-15.
- East FCC Tariff 39 Section 27, page 27-15.
- West FCC Tariff 1 Section 35, page 35-15.
- Southwest FCC Tariff 73 Section 43, page 43-15.

B. Committed Information Rate (CIR)

Bronze or Silver CIR (5, 10, 20, 50, 100, 250, 500, 1000 Mbps)

- Asset activity – Placement of an Ethernet switch, IOF capacity and network translations to identify bandwidth for particular user application.
- Function – Identifies and limits the amount of traffic to be transmitted through the packet network.

CIR Bandwidth Charges	Monthly Recurring Rate	NRC
5	$ 450	$75
10	$ 650	$75
20	$ 900	$75
50	$1,025	$75
100	$1,200	$75
250	$1,575	$75
500	$1,900	$75
1000	$2,575	$75

CIR Speed (Mbps)	Monthly Recurring Rate	NRC
5	$ 650	$75
10	$ 850	$75
20	$1,225	$75
100	$1,400	$75
250	$1,975	$75
500	$2,300	$75
1000	$2,975	$75

CIR rates can be found in the following tariff sections:

- Midwest FCC Tariff 2 Section 24, pages 24-15, 24-16.
- East FCC Tariff 39 Section 27, pages 27-15, 27-16.
- West FCC Tariff 1 Section 35, pages 35-15, 35-16
- Southwest FCC Tariff 73 Section 43, pages 43-15, 43-16.

C. Ethernet Virtual Channels (EVCs)

- Asset activity – EVCs are logical connections that do not have any physical attributes. They are the software translations that create the logical connections between ports on the network and occupy memory within the Ethernet routers and switches.
- Function - Identify the allowable paths through the network.

Monthly	**Bronze**	**Silver**	
EVC CIR Range	MRR	MRR	NRC per EVC
5-100 Mbps	$0.00	$0.00	$0.00
101-500 Mbps	$0.00	$0.00	$0.00
501-1000 Mbps	$0.00	$0.00	$0.00

EVC rates can be found in the following tariff sections:

- Midwest FCC Tariff 2 Section 24, page 24-17.
- East FCC Tariff 39 Section 27, page 27-17.
- West FCC Tariff 1 Section 35, page 35-17.
- Southwest FCC Tariff 73 Section 43, page 43-17.

D. Repeater

Repeater – If transmission distance limitations exist.

- Asset activity – Repeater placement, IOF fiber
- Function – Regenerates the Ethernet signal to extend the reach of OPT-E-MAN to a greater distance.

Item	**M-to-M**	**1**	**2**	**3**	**5**	**NRC**
Repeater	$475	$400	$375	$325	$300	$250

Repeater rates can be found in the following tariff sections:

- Midwest FCC Tariff 2 Section 24, 24-17.
- East FCC Tariff 39 Section 27, page 27-17.
- West FCC Tariff 1 Section 35, page 35-17.
- Southwest FCC Tariff 73 Section 43, page 43-17.

E. Media Access Control (MAC) Addresses (Max of 100)

- Function – Enables the network to be aware of additional customer addresses. Fifty MAC addresses are included with the purchase of a port.
- Asset activity – Ethernet switch memory, translations. The MAC is an address for the customer LAN equipment.

Item	MRC	NRC
Additional MAC Addresses (51-100)	$5.00	$70.00

F. Other Charges

Item	Recurring	NRC
Administrative Charge per order	N/A	$ 60
Design and Central Office Connection Charge per circuit	N/A	$ 0
Customer Connection Charge per termination	N/A	$ 0

The foregoing rates can be found in the following tariff sections:

- Midwest FCC Tariff 2 Section 24, page 24-17.
- East FCC Tariff 39 Section 27, page 27-17.
- West FCC Tariff 1 Section 35, page 35-17.
- Southwest FCC Tariff 73 Section 43, page 43-17.

QUESTION: 4
4.) What entity buys each rate element?

ANSWER:
End-user or carrier customers purchase the port and CIR components to facilitate communications between their location(s) and the OPT-E-MAN network. The end-user or the carrier can then order an EVC to connect multiple ports together. In addition, if an end-user customer needs more than 50 MAC addresses per port, there is an option to purchase an additional 50 addresses. Depending on the location of the customer's serving wire center and the Ethernet switch, a repeater may be required.

QUESTION: 5
5.) Please provide a list of access services that a carrier could purchase from SBC to provide services comparable to the SBC services identified in the ex parte.

ANSWER:
Carriers have a multitude of special access services available from SBC which could be combined to provision advanced services. The table below describes some of the various scenarios.

End-user to Serving Wire Center	**Serving Wire Center to Serving Wire Center (IOF)**	**Serving Wire Center to Carrier POP**
DSO/DDS – Special Access DS1 - Special Access DS3 - Special Access OC3 – Special Access OC12 – Special Access OC48 – Special Access GigaMAN – Special Access	DSO/DDS – Special Access DS1 - Special Access DS3 - Special Access OC3 – Special Access OC12 – Special Access OC48 – Special Access GigaMAN – Special Access Carriers can terminate in a collocation cage in a Serving Wire Center or place tail circuits onto a ring and take advantage of the higher speed transport.	DSO/DDS – Special Access DS1 - Special Access DS3 - Special Access OC3 – Special Access OC12 – Special Access OC48 – Special Access GigaMAN – Special Access Carriers can place circuits onto a ring entrance facility.